



Michael J. Willemin

mwillemin@wigdorlaw.com

February 9, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
Daniel Patrick Moynihan
500 Pearl St.
New York, NY 10007-1312

Re: Parker v. Bursor et al., Civil Case No.: 1:24-cv-00245-JGLC-RFT

Dear Judge Clarke,

We represent Plaintiff Angelica Parker in this action and write on behalf of both parties to respectfully request an extension of the deadlines to file: (i) the Complaint in this action from February 5, 2024 to March 5, 2024; and (ii) objections to Magistrate Judge Robyn F. Tarnofsky's January 24, 2024 Report and Recommendation (Dkt. No. 25) from March 5, 2024 to April 7, 2024. The reason for the first request is that we were only recently retained (Plaintiff filed this action *pro se*) and are continuing to sift through voluminous materials related to the claims that will be asserted in the Complaint. The reason for the second request is that counsel for Defendants needs adequate time to review the Complaint before deciding whether, and to what extent, Defendants will object to the January 24, 2024 Report and Recommendation.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. J. Willemin", written over a horizontal line.

Michael J. Willemin